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2011 Sep-07 PM 04:07 U.S. DISTRICT COURT N.D. OF ALABAMA

EXHIBIT 6

BAKER BOTTS IIP

June 24, 2011

BY ELECTRONIC MAIL

Terry Collingsworth Conrad & Scherer 1156 15th St. NW Suite 502 Washington, DC 20005

Re:

Review of 2001 Bank Records

Dear Terry:

I write with respect to the defendants' production of documents in response to Plaintiffs' First Request for Production of Documents No. 91. In that request, you asked for bank records from 1996 to 2006 for both Drummond Company, Inc. and Drummond Ltd.

The plaintiffs previously agreed to review the responsive documents from 2001, and then decide whether to seek review of the documents for the entire requested time period. As we discussed, there are four categories of documents: (1) bank statements; (2) bank reconciliations; (3) cancelled checks (if any); and (4) spreadsheets of payments from these two companies to third-party vendors.

We have been in the process of gathering these documents from off-site storage and are prepared to make them available in Birmingham for your inspection the week of July 11, 2011. This is the week before the depositions of the plaintiffs. We can also make them available in Birmingham at a mutually-agreeable date after July 11th. The documents being produced for inspection will not be bates stamped. If plaintiffs request copies of certain of the documents, bates stamped copies of the requested documents will be produced.

Please let me know when you would like to review the documents, so we may make the appropriate arrangements.

Sincerely,

1299 PENNSYLVANIA AVE., NW AUSTIN WASHINGTON, D.C. 20004-2400

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